SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Advocacy Questionnaire
OMB CONTROL NO. 0625-0220

A. JUSTIFICATION

This request is to extend the Office of Management and Budget approval and request the approval of proposed revisions to the questionnaire.

1. Explain the circumstances that make the collection of information necessary.

The International Trade Administration's Advocacy Center marshals federal resources to assist U.S. firms competing for foreign government procurements worldwide. The Advocacy Center works closely with the Trade Promotion Coordination Committee, which is chaired by the Secretary of Commerce, and includes 19 federal agencies involved in Export Promotion. Advocacy assistance is wide and varied, but most often it is used to assist U.S. companies that must deal with foreign governments or government-owned entities to win or maintain business projects in foreign markets. The Advocacy Center's goal is to ensure opportunities for American companies in the international marketplace.

The purpose of the Advocacy Questionnaire is to collect the information necessary to evaluate whether it would be appropriate to provide U.S. Government (USG) advocacy assistance on a given transaction. Private sector U.S. companies may fill this form out to request advocacy from USG official when they are bidding on an overseas tender against foreign companies. The advocacy provided by Ambassadors, Secretaries and the President allows the USG to provide the same support to U.S. companies that foreign governments are providing for their companies in these projects. With his form the Advocacy Center/USG is able to provide advocacy when requested by clients.

ITA proposes to obtain approval to make the following revisions to the Advocacy Questionnaire (currently-approved questionnaire is in ROCIS in IC Documents section).

Under Section A: Project/Transaction –

1) Revised Question 1 (from the previously approved questionnaire) to request specific information from clients thereby eliminating the necessity for staff to go back to clients to request additional information.

2) Combined and reformatted Questions 2-5 (from the previously approved questionnaire) to both make the question clearer for clients and reduce redundancies in the questionnaire.

3) Reformatted the language in Question 8 (from the previously approved questionnaire) to make the question clearer to clients.

4) Revised the language in Question 10 (from the previously approved questionnaire) to request specific information which will eliminate the necessity for staff to go back to clients to request additional information.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The Advocacy Center, appropriate ITA officials, officers/Ambassadors at U.S. Embassies/Consulates worldwide and other federal agencies that provide advocacy support to U.S. companies, request companies seeking USG advocacy support to complete the questionnaire. The information derived from a completed questionnaire is critical in helping the Advocacy Center determine whether it is in the U.S. national interest to advocate on a specific transaction.

Advocacy Center staff regularly receives feedback from their clients regarding the substance and format of this form. It is in reaction to the feedback that the Advocacy Center receives from clients indicating that the form could be streamlined or improved, that the Advocacy Center is requesting approval to implement these changes. These changes streamline the questionnaire in several ways- they take out questions that are no longer relevant, are rewritten to ask specifically what is needed so to reduce confusion from clients, and are reformatted to allow the questions to flow in a manner that makes it quicker to the client to complete the questionnaire.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Clients may access the form on the Commerce website, from Advocacy Center staff or through overseas staff at U.S. embassies. Clients may complete the form electronically and send it to Advocacy Center staff via electronic means. The vast majority of Advocacy Center clients complete the form electronically, but a hard copy form may be used in circumstances such as with clients who may not have access to the Internet.

4. Describe efforts to identify duplication.

There is no duplication of information within the Department of Commerce or another government entity. This form collects unique client information that is required by the

Advocacy Center to efficiently and effectively provide the very specific and tailored services to provide our clients with USG advocacy support.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden</u>.

The Advocacy Center has worked with U.S. companies to solicit feedback to help ensure that this form is simple and easy to use. Based on client feedback the Advocacy Center has streamlined/revised the Advocacy Questionnaire form to make it easier to understand and complete.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently</u>.

Without the collected information collected the Advocacy Center/USG would be unable to coordinate advocacy efforts on the behalf of U.S. companies that enables them to win business opportunities worldwide. Without this questionnaire, the Advocacy Center is unable to tailor its Advocacy support to individual company needs which would inhibit its ability to provide customized Advocacy support to U.S. businesses seeking access to the international marketplace, helping them enter new markets, increase market share and compete effectively worldwide.

7. <u>Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines</u>.

This collection will be conducted in a manner consistent with OMB guidelines.

8. <u>Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments</u>. <u>Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported</u>.

A Federal Register Notice was published on June 26, 2009 (Vol. 74, Number 122, page 30524) soliciting public comment. No comments were received.

9. <u>Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees</u>.

None.

10. <u>Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy</u>.

The following statement appears on the questionnaire –

Freedom of Information Act: Information submitted to the government may be subject to disclosure pursuant to the Freedom of Information Act. However, all confidential commercial information will be protected from disclosure to the extent permitted by law. You will be notified if any such information submitted by you is responsive to a Freedom of Information Act request.

11. <u>Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private</u>.

No questions of a sensitive nature are asked.

12. <u>Provide an estimate in hours of the burden of the collection of information</u>.

It is estimated that 400 requests for information will be submitted annually and will take approximately 30 minutes to complete. Total burden hours will equal 200.

Form	Estimated time to complete	Estimated number of respondents	Estimated total burden hours	Previous total burden hours
Advocacy Questionnaire	30 Minutes	400	200	200

The estimated annual labor cost is $6,400 (200 hours X $35 (average private sector hourly salary).

13. <u>Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above)</u>.

Not Applicable.

14. <u>Provide estimates of annualized cost to the Federal government</u>.

It will take CS staff approximately 30 minutes to review each form and the total burden hours to review 400 forms will be 200 hours.

200 hours X $25/hr. staff time = $5,000

15. Explain the reasons for any program changes or adjustments.

The proposed minor revisions to the Advocacy Questionnaire will not change the burden hours.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Not applicable. The information collected is used by clients for requesting advocacy support and by the Advocacy Center/USG staff for providing advocacy services to individual clients.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable. The OMB number and expiration date will be displayed on the form.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq